

Jimmy L. Ratcliff
754 E. Bethel School Road
Coppell, Texas 75019
972-304-9999
FC200@aol.com

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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, D.C 20590-0001

Docket No. FAA-2003-15571

I wish to comment on Docket No. FAA-2003-15571, Final Rule; request for comments, published in the Federal Register/Vol. 68, No. 132/ Thursday, July 10, 2003. This rule concerns the Admission to flight deck of DOD commercial air carrier evaluators.

Since September 11, 2001, security of air carrier flight decks has been a very high priority, one of national defense. I question if "free and uninterrupted access to the pilot's compartment" is prudent or necessary.

Using FAA Form 8430-6 and proper planning, DOD can schedule their commercial air carrier evaluators through the carrier they wish to evaluate. The presentation of yet another form of identification (the S&A Form 110B), that will be the sole form of access, opens up the pilot's compartment to potential abuse. With today's digital resources, virtually any document can be falsified. Furthermore, pilots are not trained to detect falsified documents. We believe S&A Form 110B is not necessary and should not be issued.

There are many people who wish to gain access to the pilot's compartment. Certainly, terrorist's have used their knowledge of the "common strategy" to develop their strategy and tactics in gaining access to the pilot's compartment. Some other groups just want a free ride. The control of DOD evaluators will rest solely with DOD, and beyond the control of the FAA or the air carrier. The new 14 CFR part 121. 547 refers to DOD evaluators as "who is performing official duties." How does the air carrier pilot know the DOD evaluator is in an official capacity? The Form 110B will not include that information.

The use of the 110B is not a good system. DOD evaluators would be able to ride, unannounced in any carrier's cockpit, even if that carrier is not subject to DOD evaluations. Additionally there is no specific guidance materiel available to carriers about the conduct of DOD evaluations, unlike the FAA Air Transportation Operations Inspector's Handbook, FAA-8400.10. Also, DOD Evaluators are not under the control of the Secretary of Transportation. In recent years DOD has

demonstrated control problems with some of its personnel. Military personnel who have sold sensitive material to foreign powers have demonstrated this. If controlling their personnel in national security matters is challenging, why should we accept only the controls of DOD upon these evaluators? The airline cockpits of our airlines are potential weapons. Leaving their access solely to the discretion of the military is a system with only one level of security.

In any case, security of the flight is potentially impacted, when non-air carrier riders are in the pilot's compartment. Determining who needs to be in the pilot's compartment and who they are, is key to the solution. If the present system is deemed too cumbersome, we believe that the air carrier can implement an effective and simple system.

We propose the following. To gain access, the evaluator would contact dispatch of the air carrier subject to the inspection. Dispatch would follow the procedures, which have been developed by the air carrier and approved by the FAA Principal Operations Inspector. The carrier would then be able to easily verify the mission and the identity of the evaluator. These procedures could include issuing a Personal Identification Number (PIN), which could be placed on the Flight Release. When approached by a DOD evaluator the Captain would easily verify the identity of the evaluator and the need for the mission by:

1. The DOD evaluator would present their military identification and orders and PIN for the mission.
2. The Captain would match the PIN on the release with the PIN presented by the evaluator.

Note: Some crews may not know about the DOD evaluator program. With the PIN number and the evaluator's name listed on the release, the crew will more easily be able to verify that the mission is necessary and grant access to the evaluator.

This type of system would stream line the process and meet the needs of both parties.

Cost must be considered. As written, Docket-2003-15571 has the potential to increase the cost of each flight that the evaluator rides on. Most pilots will be unfamiliar with the DOD evaluator. It could easily take several minutes for a Captain to verify the S&A Form 110B and the evaluator, the rule notwithstanding. This distraction is going to cost the air carrier money.

Federalism is supposed to serve the public. We think "free and uninterrupted access to the pilot's compartment", as stated in this Docket needs another level of control. The FAA and the air carrier can provide the necessary level of control. This Docket, as written, is not warranted and is an intrusion into the airline

industry's ability to provide safe, efficient, and secure air transportation, at reasonable costs.

Thank you.